

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

In re:)	Chapter 7
)	
JTR1, LLC, f/d/b/a JTR, LLC,)	Case No. 20-30141
)	
)	
Debtor.)	
)	
)	
A. Burton Shuford, Trustee of the)	
Bankruptcy Estate of JTR1, LLC,)	
f/d/b/a JTR, LLC,)	
)	
Plaintiff,)	
)	Adv. Proc. No. 22-03018
v.)	
)	
BJS Insurance, LLC, and)	
JJM, LLC,)	
)	
Defendants.)	

**OBJECTION OF BJS INSURANCE, LLC AND JJM, LLC TO
PLAINTIFF'S MOTION FOR RELIEF FROM JUDGMENT**

Defendants BJS Insurance, LLC and JJM, LLC (together, the “Defendants”), by and through undersigned counsel, hereby submit this objection (the “Objection”) to the *Motion for Relief from Judgment* [Doc. 26] (the “Motion”) filed by Plaintiff A. Burton Shuford, Trustee (the “Trustee” or “Plaintiff”) for the chapter 7 bankruptcy estate of JTR1, LLC.

In support of this Objection, Defendants hereby join in all respects and incorporate by reference the arguments set forth in the *Objection to Motion for Relief from Judgment* filed by the defendants in Adv. Proc. No. 22-03004 [Doc. 30] and by the defendants in Adv. Proc. No. 22-03008 [Doc. 31] (the “Kearns and Mullady Objections”), copies of which are attached hereto as

Exhibit A. For the reasons stated in the Kearns and Mullady Objections, Defendants request that the Court deny the Plaintiff's Motion.

This is the 8th day of September, 2022.

K&L GATES, LLP

/s/ Margaret R. Westbrook

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